

CAPONE AND KEEFE, PC  
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Attorney for Debtor(s)

In Re:

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NJ

**Michael Leineek**

Case No.: 13-31295 (KCF)  
Chapter 13

Debtor(s)

**CERTIFICATION OF DEBTORS RESPONSE  
TO THE TRUSTEE'S OBJECTION TO  
CONFIRMATION**

I, Michael Leineek, upon my oath according to law, hereby certify as follows:

1. I have been trying to obtain a loan modification since my Chapter 13 Bankruptcy was filed.
2. On October 14, 2013, a loan modification application was submitted to my mortgage company, Residential Credit Solutions.
3. On March 25, 2014, my modification request was denied by Residential Credit Solutions.
4. On December 22, 2014, my attorney submitted a new loan modification package to Residential Credit Solutions for review. Again, my request for a loan modification was never approved.
5. On May 2, 2016, my mortgage was sold to Ditech. I am in the process of completing the new loan modification application for Ditech, along with a Profit and Loss for my business which is a requirement.
6. My accountant was on an extended vacation last month, which resulted in a delay in my obtaining the necessary Profit and Loss statements.
7. I am current with my post petition mortgage payments.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 8/17/17

By: /s/ Michael Leineek  
MICHAEL LEINEEK